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October 19, 2001

FEDERAL EXPRESS

Docket Coordinator CERCLA Docket Office U.S. Environmental Protection Agency 1200 Pennsylvania Avenue N.W. (Mail Code 5201G) Washington, D.C. 20460

> Re: Proposed NPL Listing of Sauget Areas 1 and 2 Request for an Extension of Time to Comment

Dear Docket Coordinator:

I am writing this letter on behalf of BFI Waste Systems of North America, Inc. ("BFIWSNA"). On September 13, 2001, the United States Environmental Protection Agency ("USEPA") proposed the listing of seventeen new sites to the National Priorities List ("NPL"). Included among those seventeen sites was Sauget Area 2 in Sauget, Illinois. BFIWSNA is alleged to be a Potentially Responsible Party with respect to Sauget Area 2, and likely will be submitting comments on USEPA's proposed NPL listing.

I understand the sixty-day comment period is scheduled to end on November 13, 2001. Given the number of issue surrounding the Site, the delay in obtaining reference documents and the fact that a number of other companies have been granted extensions until December 13, 2001, BFIWSNA hereby requests an extension of time to comment with respect to Sauget Area 2 through and including December 13, 2001.

As USEPA is aware, Sauget Area 2 is composed of five different "sites". The HRS documentation for Sauget Area 2 includes thirty reference documents, some of them voluminous. A thorough review of USEPA's analysis of the sites making up Area 2, as well as the cited reference documentation, will be a lengthy process.

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We have spoken with Ms. Janet Phundheller at USEPA Region 5 regarding obtaining copies of the cited reference documents for Sauget Area 2. Ms. Phundheller ran into several difficulties but has indicated that we can expect to have the CD-Rom by October 22, 2001.

Finally, we understand that at least Solutia and Ameren have been given until December 13, 2001 to file comments. Thus, granting the same extension to BFIWSNA will not unduly delay these proceedings.

I look forward to hearing from you at your convenience as to whether USEPA is willing to grant this extension of time to comment through December 13, 2001. Thanks.

Sincerely yours,

LATHROP & GAGE L.C.

By:

Thomas A. Ryan

TAR/df

cc: Mr. Steve Doss